

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900007-2015**  
Application Received: **May 1, 2015\***  
Plant Identification Number: **03900007**  
Permittee: **Bayer CropScience**  
(Emergency Services)  
(Group 1A of 8)

Facility Name: **Institute Site**  
Mailing Address: **P.O. Box 1005**  
**Institute, WV 25112**

\* Submitted as R30-03900007-2015 (Group 1 of 8)

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Physical Location:	Institute, Kanawha County, West Virginia
UTM Coordinates:	432.00 km Easting • 4,284.31 km Northing • Zone 17
Directions:	The facility is located west of Institute, WV, adjacent to State Route 25 and West Virginia State University

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### Facility Description

Bayer CropScience plans on selling part of this unit to the Union Carbide Corporation's Institute Plant (03900005) over the course of two different dates. In order to facilitate the sell, the Permittee will split the Group 1 of 8 Title V Permit as follows:

Group 1 of 8 – Powerhouse/Laboratory (will remain with Bayer)

Group 1A of 8 – Emergency Services (will be sold to Union Carbide)

Group 1B of 8 – Wastewater Treatment Unit and Maintenance (will be sold to Union Carbide)

Group 1A of 8 includes an emergency generator (EG-1), #2 Fuel Oil Tank (T-EG), three Fire Pump Storage Tanks (T-699, T-154, and T-155), and three Fire Water Pumps (P-302, P-1019, and P-1020).

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions For Emergency Services Equipment</b>	<b>2013 Actual Emissions (Facility Wide)</b>
Carbon Monoxide (CO)	1.4	88
Nitrogen Oxides (NO <sub>x</sub> )	6.2	1,081
Particulate Matter (PM <sub>2.5</sub> )	0.006	9.4
Particulate Matter (PM <sub>10</sub> )	0.22	21
Total Particulate Matter (TSP)	0.96	30
Sulfur Dioxide (SO <sub>2</sub> )	0.25	1.5
Volatile Organic Compounds (VOC)	0.25	13
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions For Emergency Services Equipment</b>	<b>2013 Actual Emissions (Facility Wide)</b>
Total HAPs	< 0.1	131

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs, Bayer CropScience's Institute Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, and operation of stationary sources
	45CSR16	Standards of performance for new stationary sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission standards for HAP's

	40 C.F.R. 60, Subpart IIII	Standards of performance for stationary compression ignition internal combustion engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart ZZZZ	NESHAP for stationary reciprocating internal combustion engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
G60-C023	11/19/2010	
G60-C	5/21/2009	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

The Union Carbide Corporation Institute Plant intends on purchasing assets owned by the Emergency Services Section of Bayer CropScience Institute Plant. The Bayer CropScience Group 1 of 8 plant will be broken up into Group 1 of 8 (Powerhouse/Laboratory), Group 1A of 8 (Emergency Services), and Group 1B of 8 (Wastewater Treatment Unit and Maintenance). The units transferred to this Group 1A of 8 Title V Permit include an Emergency Generator (EG-1), #2 Fuel Oil Tank (T-EG), #2 Fire Water Pump (P-302), #3 Fire Water Pump (P-1019), and #4 Fire Water Pump (P-1020), #2 Fire Water Pump Diesel Fuel Storage Tank (T-699), #3/#4 Fire Water Pump Diesel Fuel Storage Tank (T-154), and #3/#4 Fire Water Pump Diesel Fuel Storage Tank (T-155). Bayer CropScience submitted a renewal for R30-03900007-2015 (Group 1 of 8) on May 1, 2015. The applicable units and requirements are being transferred to this Title V Permit.

The Emergency Generator (EG-1) is subject to 40CFR60, Subpart IIII and 40CFR63, Subpart ZZZZ. Per 40 CFR§63.6590(c)(6), a new emergency RICE with a site rating of less than 500 hp located at a major source of HAP's must meet the requirements of 40CFR63, Subpart ZZZZ by meeting the requirements of 40CFR60 Subpart IIII. The requirements for EG-1 and #2 Fuel Oil Tank (T-EG) are contained in R13 General Permit Registration G60-C023 and General Permit G60-C. The requirement is given in Condition 4.1.1 and the General Permit requirements are provided in Attachments A and B. The emission unit ID and Emission Point ID for the #2 Fuel Oil Tank have been changed from "6392N54277" and "6392N54277" to "T-EG" and "E-TEG", respectively.

The diesel fueled Fire Water Pumps (P-302, P-1019, and P-1020) are subject to the existing Stationary Rice (the pumps were constructed before June 12, 2006) requirements of 40CFR63, Subpart ZZZZ.

Condition 5.1.1 requires oil changes and inspection of the air cleaner, and hoses and belts. Condition 5.1.2 requires the Permittee to operate and maintain the pump engines in a manner consistent with safety and good air pollution control practices. Condition 5.1.3 requires the Permittee to operate and maintain the pump engines according to the manufacturer's instructions or to develop their own maintenance plan. Condition 5.1.4 requires the Permittee to have a non-resettable hour meter installed on the pump engines. Condition 5.1.5 allows the Permittee to perform an oil analysis to possibly extend the specified oil change requirements. Condition 5.1.6 limits engines' hours for maintenance and non-emergency situations. Condition 5.1.7 requires the Permittee to be in compliance with all requirements of 40CFR63, Subpart ZZZZ. Condition 5.4.1 requires the Permittee to keep records of any maintenance conducted on the pump engines. Condition 5.4.2 requires the Permittee to keep records of the hours of operation the pump engines were used for emergency and non-emergency operation. Condition 5.5.1 requires the Permittee to report any instance that it did not meet the requirements of Condition 5.1.1 and to report it as required by condition 5.5.3. Condition 5.5.2 requires the Permittee to report each instance they did not meet the general provisions of Subpart ZZZZ for the pump engines. Condition 5.5.3 requires all deviations for the pump engines be reported in the semiannual monitoring report. Condition 5.5.4 specifies annual reporting requirements including engine information and usage.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40CFR60, Subpart IIII

The Fire Water Pumps (P-302, P-1019, and P-1020) were constructed before the applicability date of July 11, 2005 for 40CFR60, Subpart IIII.

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: June 15, 2015

Ending Date: July 15, 2015

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Mike Egnor  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478  
michael.egnor@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

(Choose) Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.